



**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**JIM MOCK, *et al.***

**Plaintiffs,**

**v.**

**CHANDELEUR HOMES, INC., *et al.***

**Defendants.**

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**Case Number: 2:06-cv-00395-CSC**

**STATE OF GEORGIA**

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**TIFT COUNTY**

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**A F F I D A V I T**

Before me the undersigned authority, in and for said state and county, personally appeared, Parker Holloway, who being by me first duly sworn, under oath, deposes and says:

1. My name is Parker Holloway and I am over the age of 19 years. I am the Field Operations Manager for Redman Homes, Inc. (hereinafter referred to as "Redman"), Grand Manor Homes of Thomasville, Inc. (hereinafter referred to as "Grand Manor"), and Champion Homes of Boaz, Inc. f/k/a Homes of Legend, Inc. (hereinafter referred to as "Legend") and Chandeaur Homes, Inc. (hereinafter referred to as "Chandeaur") and I have personal knowledge of the facts set forth in this Affidavit. As Field Operations Manager for Redman, Grand Manor, Legend and Chandeaur, I work with service departments that handle the service of manufactured homes produced by the above companies and assist with service related issues. I make this Affidavit and appear specifically for the purpose of supporting the motion filed in the above styled action and without waiving jurisdiction. I do hereby certify that as Field Operations Manager, I have access to the files and records of Chandeaur, including the file which is maintained in connection with the Chandeaur manufactured home which was allegedly

purchased by Jim Mock and Ann Mock (hereinafter referred to as “Plaintiffs”), a new 2004 28' x 70' 2953-4B2, Serial Number CH3AL07932A/B (hereinafter referred to as the “Manufactured Home”) that is made the basis of the Complaint. I have carefully examined said files and the documents contained therein. Said files and the documents contained therein are kept in the ordinary course of Chandeaur’s business, prepared by a person with knowledge of or made from information transmitted by a person with knowledge of the acts and events appearing in them, and made at or near the time of the acts and events appearing in them.

2. Chandeaur is a corporation organized and existing under the laws of the State of Michigan, with its principal place of business in Auburn Hills, Michigan. Until around May 2005, Chandeaur’s only offices in the State of Alabama were located in Boaz, Marshall County, Alabama. All of Chandeaur’s production, sales and service work was coordinated through offices in Marshall County, Alabama until around May 2005 when Chandeaur’s plant closed. At that time, Chandeaur ceased producing manufactured homes and all its files and records were transferred either to Auburn Hills, Michigan or to Guin, Marion County, Alabama. Decisions relating to the business operations of Chandeaur are made in Auburn Hills, Michigan, with the exception of routine issues related to Chandeaur’s service work, which from around May, 2005 to present has been coordinated through offices in Marion County, Alabama. Chandeaur has never maintained an office in any county in Alabama other than Marshall County and Chandeaur’s serial number files for homes produced by Chandeaur are currently located in Marion County.

3. Chandeaur does not and never has sold new manufactured homes directly to the public and only sold new manufactured homes to various independent dealers. Chandeaur does not and never has owned any manufactured home dealerships that sell manufactured homes

directly to the public. Chandeaur's records indicate that Chandeaur manufactured the Manufactured Home in April, 2003 at its plant in Marshall County, Alabama. A true and correct copy of a Manufacturer's Statement or Certificate of Origin to a Mobile Home showing Chandeaur's address at the time the Manufactured Home was produced is attached to the motion. Chandeaur Homes, Inc.'s Limited Warranty & Arbitration Agreement (hereinafter referred to as the "Limited Warranty") was issued from and originated in Marshall County, Alabama. The Manufactured Home was ordered by a dealer in manufactured homes, Wayne Frier Home Center (hereinafter referred to as "Wayne Frier"), located in Dothan, Houston County, Alabama. Chandeaur's file reflects that the Manufactured Home was installed in Dale County, Alabama. Pursuant to the Warranty, Chandeaur performed repairs to the Manufactured Home while it was installed in Dale County, Alabama. A true and correct copy of a Chandeaur Service Work Order reflecting work performed on the home in Dale County, Alabama is attached to the motion.

4. This affidavit is true and correct to the best of my knowledge, information and belief.

CHAMPION HOMES OF BOAZ, INC.  
F/K/A HOMES OF CHANDELEUR, INC.


By: [Signature]  
Its Field Operations Manager

**STATE OF GEORGIA** \*  
\*  
**TIFT COUNTY** \*

## ACKNOWLEDGEMENT

I, the undersigned, a Notary Public in and for said County and State, hereby certify that Parker Holloway, as Field Operations Manager of Champion Homes of Boaz, Inc. f/k/a Chandeaur Homes, Inc., whose name is signed to the foregoing Affidavit, and who is known to me, acknowledged before me on this date that, being informed of the contents of the instrument, he, as such officer and with full authority, executed the same voluntarily for and as the act of said corporation.

Given under my hand and official seal this 28<sup>th</sup> day of April,  
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Notary Public  
My Commission Expires: \_\_\_\_\_

BRENDA S. DANIEL  
Notary Public, Tift County, Georgia  
My Commission Expires Jan. 13, 2008